

### REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 22, 23, and 26-43 are pending in the present application. Claims 23, 26-37, and 39-42 are amended by the present amendment. Claim 43 has been presently added. No new matter was added, as discussed below.

In the outstanding Office Action, Claims 23-37 and 39-42 were objected to; and Claims 22, 23, and 26-42 were rejected under 35 U.S.C. § 102(e) as anticipated by Koike et al. (U.S. Patent No. 6,965,191, herein Koike).

Regarding the objection to Claims 23-37 and 39-42, the claims have been amended as suggested by the outstanding Office Action to replace “a structure” with “the structure” and “a screen” with “the screen.” However, the remaining objections are traversed as discussed next.

Regarding Claim 28, the outstanding Office Action considers that the claimed conducting element that constitutes the covering sheet is unclear. However, Applicants note that Claim 22, from which Claim 28 depends, recites that while one of the first and second sheets is made of a thermoplastic, the other of the first and second sheets constitutes a covering sheet. Claim 27 introduces a support sheet and Claim 28 recites that the support sheet is the covering sheet recited by Claim 22. Thus, Applicants believe that Claim 28 clearly recites the relationship between the support sheet introduced in Claim 27 and the covering sheet introduced in Claim 22.

Regarding the same claim, and also Claims 30, 32, 33, and 34, the outstanding Office Action indicates that the “thermoplastic first sheet” lacks antecedent basis. Applicants note that Claim 22, from which all these dependent claims depend, recites first and second plastic sheets, and also recites that at least one of the first and second sheets is made of a

thermoplastic and also recites on line 8 “the thermoplastic sheet.” Thus, Applicants respectfully submit that dependent Claims 28, 30, 32, 33, and 34 do not lack antecedent basis as one of the first and second plastic sheets that is made of thermoplastic is the thermoplastic sheet.

Regarding Claim 32, the outstanding Office Action considers that the feature “when the covering sheet does not constitute a support sheet for the conducting element” is unclear. Applicants note that this claim indicates that the covering sheet is different than the support sheet for the conducting element, which is opposite to Claim 28, which recites that the support sheet constitutes the covering sheet.

Regarding Claims 34, 36, 40 and 42, the outstanding Office Action considers that the feature “the structure” is unclear. However, Applicants note that the preamble of each dependent claim starts with “The structure” and thus, it is clear that the claimed “structure” refers to the “structure” recited by independent Claim 22.

Regarding Claim 35, the outstanding Office Action considers that this claim is unclear. However, Applicants respectfully submit that this claim clearly recites that the transparent structure has two faces, one facing the thermoplastic sheet and one facing away from the thermoplastic sheet.

Regarding Claim 37, the outstanding Office Action considers that the claimed “at most 22%” is unclear. Claim 37 recites that “the infrared filter ensures transmission at 815 nm of at most 22%.” The 22% is the upper range for which transmission is achieved and it is not clear how the outstanding Office Action would propose to recite this upper limit for the transmission of the infrared filter.

Accordingly, it is respectfully requested these objections be withdrawn.

The rejection on the merits of the claims is respectfully traversed for the following reasons. In this respect, it is noted that the claims have not been amended to overcome the

applied art but only to correct minor informalities as suggested by the outstanding Office Action.

Briefly recapitulating, independent Claim 22 is directed to an optical filtering/electromagnetic screening structure to be joined to at least one transparent structure. The structure includes at least first and second plastic sheets and a conducting electromagnetic screening element between the first and second plastic sheets. One of the first and second sheets is neutral to light while the other of the first and second sheets includes at least two pigments or dyes that provide an orange filter and an infrared filter, respectively, the orange filter filtering out light having a wavelength center on 590nm.

Therefore, independent Claim 1 recites that one of the first and second plastic sheets includes both the orange filter and the infrared filter, a feature that is not shown by the applied art as discussed next.

Turning to the applied art, the outstanding Office Action considers that Koike shows, for example in Figure 3, a structure having first and second plastic sheets 20 and 63, and a conducting electromagnetic screening element 10. The outstanding Office Action asserts in the paragraph bridging pages 3 and 4 that one of the first and second plastic sheets 20 and 63 includes an orange filter as disclosed at column 20, lines 25-50 and an infrared filter as disclosed at column 21, lines 20-23 and at column 57, line 65 to column 58, line 3. However, Applicants disagree with this assessment of Koike for the following reasons.

Regarding Figure 3, Koike discloses that a reference numeral 10 “denotes a transparent electrically conductive layer (D),” a reference numeral 20 “denotes a polymer film (B),” and a reference numeral 60 “denotes a functional transparent layer (A).”<sup>1</sup>

Further, Koike discloses at column 20, lines 25-50, and more specifically at column 20, lines 25-31, that a “minimum transmittance of the electromagnetic wave shielding body

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<sup>1</sup> Koike, col. 45, lines 10-27.

in the wavelength of from 570 nm to 605 nm is allowed ... by using a dye having an absorption maximum in a wavelength of from 570 nm to 605 nm.” The outstanding Office Action, relying on this disclosure of Koike, considers that an orange filter is formed in the polymer layer 20 or 63.

However, this disclosure of Koike is silent about the exact location of the dye having the absorption maximum in the wavelength of from 570 nm to 605 nm. Koike discloses at column 20, lines 43-57 that a method of allowing a dye to be contained in a display filter uses a polymer film. However, it is not clear whether the polymer film corresponds to the polymer film (B) or reference numeral (20).

Although the outstanding Office Action indicates that Koike discloses at column 57, line 65 to column 58, line 3 that a near-infrared shielding film (B) might have near-infrared absorbing dyes, and that Koike discloses at column 21, lines 20-23 that “it is permissible to use one or more types of near-infrared absorption dyes together with the dyes described above,” it is not clear that Koike intended to use the dye for creating the orange filter and the dye for the infrared filter in the same polymer layer (B) (i.e., 20) or in different polymer layers.

In other words, although Koike appears to disclose that it is possible to form an infrared filter and an orange filter in polymer layers, Koike is silent whether the same polymer layer includes the two filters as required by Claim 22.

Accordingly, it is respectfully submitted that independent Claim 22 and each of the claims depending therefrom patentably distinguish over Koike.

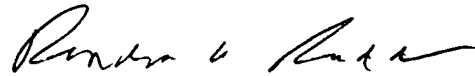
Finally, new Claim 43 defines a thermally affixed composite of the first and second plastic sheets as the screening element wherein the first and second plastic sheets are thermoplastics by which the composite is affixed together. Figure 3 of Koike applied in the Office Action with regard to Claim 34 shows an adhesive layer 40 that is used to fix the

composite filter assembly. Thus, new Claim 43 is believed to further distinguish from Koike and should be allowed.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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